

FILED

IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

JUN 20 2019  
U.S. DISTRICT COURT  
EASTERN DISTRICT OF MO  
ST. LOUIS

UNITED STATES OF AMERICA, )  
Plaintiff, )  
vs. )  
RICARDO RUSAN, )  
Defendant. )

No. **4:19CR00469 HEA/SPM**

**MOTION FOR PRE-TRIAL DETENTION AND HEARING**

Comes now the United States of America, by and through its attorneys, Jeffrey B. Jensen, United States Attorney for the Eastern District of Missouri, and Edward L. Dowd, III, Assistant United States Attorney for said District, and moves the Court to order defendant detained pending trial, and further requests that a detention hearing be held three (3) days from the date of defendant's initial appearance before the United States Magistrate pursuant to Title 18, United States Code, Section 3141, et seq.

As and for its grounds, the United States of America states as follows:

1. Defendant is charged with two counts of Bank Robbery, in violation of Title 18, United States Code, Section 2113(a).
2. Pursuant to Title 18, United States Code, Section 3142(g),
  - i. the weight of the evidence is against defendant;
  - ii. defendant robbed two separate banks in this case on two separate occasions, by wearing a blue mask and dark hoodie, and pointing what appeared to be a firearm at employees;
  - iii. surveillance footage indicates the fear and panic that resulted from defendant's actions;

- iv. defendant has been convicted of a prior Bank Robbery in this district #4:05-CR-0056-ERW for which he was on supervised release at the time of the underlying offense;
- v. the nature and seriousness of the danger to any person or the community that would be posed by defendant's release warrant defendant's detention pending trial.

WHEREFORE, the Government requests this Court to order defendant detained prior to trial, and further to order a detention hearing three (3) days from the date of defendant's initial appearance.

Respectfully submitted,

JEFFREY B. JENSEN  
United States Attorney

/s Edward L. Dowd, III

EDWARD L. DOWD III #61909MO  
ASSISTANT UNITED STATES ATTORNEY